

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

JOHN JAY CONDON,)	
)	
Plaintiff)	
)	
v.)	Civil No. 1:16-cv-00372-JAW
)	
RODNEY BOUFFARD, et al.,)	
)	
Defendants)	

**DEFENDANTS' RESPONSES TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
FROM TROY ROSS**

1. The Maine State Prison's (MSP) Internal Perimeter Security (IPS) Team's Investigative Reports regarding the investigation of prisoner and Plaintiff John Jay Condon (MSP #2425) into alleged threats (or "threatening") he may have made indirectly towards an MSP staff member. This investigation would of begun on or about March 1st, 2014, and if it did conclude, up to November 1st, 2014 (whether the investigation concluded or not, the Plaintiff requests the investigative reports of that Condon investigation).

RESPONSE:

Defendant objects to this request on the grounds that it seeks criminal investigative and intelligence information and information regarding security measures made confidential by statute

2. Since January 1st, 2000, right up to September 1st, 2017, the Plaintiff requests the names, pertinent dates and final dispositions of all MSP inmates, and only those MSP inmates, who were placed on administrative segregation (Ad Seg.) pending the outcome of an "investigation" into

alleged “threats” the inmate may or may not have made directly or indirectly, towards and MSP staff member. Inclusive if this request #2 includes the dates of admittance into Ad. Seq. status of those inmates and the final disposition regarding the “threatening” charges against said inmates. This request also includes whether the inmate was allowed back into the MSP general population (and info, the date) or the transfer of said inmate(s) into another state (and if so, the date of that transfer).

RESPONSE:

Defendant objects to this request on the grounds that it seeks information regarding other prisoners made confidential by statute; that it is overbroad and unduly burdensome; and that it seeks criminal investigative and intelligence information made confidential by statute.

3. Since January 1st, 2000, the names, pertinent dates and final dispositions of any inmate charged and found guilty by a disciplinary body pursuant to MDOC Policy No. 20.1 (Prisoner Discipline) of the charge of threatening an MSP staff member (only).

RESPONSE:

Defendant objects to this request on the grounds that it seeks information regarding other prisoners made confidential by statute; that it is overbroad and unduly burdensome; that it seeks information not relevant to any claim or defense; and that it seeks criminal investigative and intelligence information made confidential by statute.

4. Within the last 20 years or between the dates of September 1st, 1997 to September 1st, 2017, Plaintiff requests the names & pertinent documentation of any MSP inmate sent to an out of state prison as a result of an investigation into alleged threats he may of made, directly or indirectly, towards an MSP staff member (whether that investigation reached a conclusion or not). How may got sent out of state?

RESPONSE:

Defendant objects to this request on the grounds that it seeks information regarding other prisoners made confidential by statute; that it is overbroad and unduly burdensome; that it seeks information not relevant to any claim or defense; and that it seeks criminal investigative and intelligence information made confidential by statute.

October 24, 2017



James E. Fortin
Assistant Attorney General


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Certificate of Service

The undersigned hereby certifies that he served the above document by first class mail to the following:

John J. Condon
Zephyrhills Correctional Institution
2739 Gail Boulevard
Zephyrhills, Florida 33541

October 24, 2017



James E. Fortin
Assistant Attorney General